

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JESSE SOLOMON,

Plaintiff

vs.

THE BERT BELL/PETE ROZELLE NFL
PLAYER RETIREMENT PLAN and
THE NFL PLAYER SUPPLEMENTAL
DISABILITY PLAN,

Defendants.

Case No. 1:14-cv-3570-MJG

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Plaintiff Jesse Solomon pursuant to Fed. R. Civ. P. 56, hereby moves for summary judgment as to all claims in this case. Defendants' denial of Mr. Solomon's disability pension was a flagrant abuse of discretion under *Booth v. WalMart Stores, Inc.*, 201 F.3d 335 (4th Cir. 2000). The grounds in support of this Motion are more fully set forth in the accompanying Memorandum of Law and Exhibits in support thereof.

WHEREFORE, Plaintiff requests that the Court enter an order granting summary judgment in his favor and against Defendants, The Bert Bell/Pete Rozelle NFL Player Retirement Plan and The NFL Player Supplemental Disability Plan, awarding Plaintiff his costs incurred herein, and granting any other relief as the Court deems just.

Dated: July 31, 2015

Respectfully submitted,

/s/ Cyril V. Smith

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of July, 2015, I caused a copy of Plaintiff's Motion for Summary Judgment to be delivered via CM/ECF and regular mail to:

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/s/ Cyril V. Smith

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